

*SC NAACP v. Alexander,*  
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

# **Exhibit 17**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

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THE SOUTH CAROLINA STATE  
CONFERENCE OF THE NAACP, et al.,

Plaintiffs,

Civil Action No.

vs.

3:21-cv-03302-MBS-TJH-RMG

THOMAS C. ALEXANDER, et al.,

Defendants.

-----x

Remote deposition

July 6, 2022

10:02 a.m.

VIDEO-RECORDED VIDEOCONFERENCE DEPOSITION of  
EMMA DEAN, before Michele Moskowitz, a shorthand  
reporter and Notary Public of the State of New  
York.

1 DEAN

2 A. Oh, sorry. Yes. We toured the state  
3 in advance of opening the map room and then the  
4 e-mails came, you know, for a long period of  
5 time. So before the map room, after the map  
6 room. Well, before the map room opened and  
7 during the map room being open.

8 Q. Got it. So it sounds like you  
9 primarily relied on public testimony and the  
10 e-mails for your understanding of communities of  
11 interest in South Carolina today; is that  
12 correct?

13 A. Yeah. I think that was an excellent  
14 resource, hearing from the people.

15 Q. For sure. Thank you. What about any  
16 materials on racially polarized voting? Do you  
17 recall reviewing any of those?

18 A. I -- I -- I do not.

19 Q. What about any materials on current  
20 black voting age populations in the state?

21 A. Certainly that -- that's a data point  
22 on Maptitude. There are several different data  
23 points in Maptitude that comes out on an Excel  
24 spreadsheet and that would be one of them.

25 Q. So you did review materials on black

1 DEAN

2 voting age populations in the state?

3 A. No. What I'm saying is that's a data  
4 point that's on Maptitude when you're using  
5 Maptitude.

6 Q. Okay. So it would have been  
7 available to folks, but not specifically that you  
8 reviewed any materials relating to it; is that  
9 correct?

10 A. Right. So it's a data point that's  
11 available when you're working on the map. I -- I  
12 would have reviewed, again, those materials that  
13 I already named, public testimony, things that we  
14 received, and so I -- I would refer to the  
15 materials I already named.

16 Q. Okay. And besides looking at the Red  
17 Book and the cases that we just discussed, did  
18 you review any other materials on traditional  
19 redistricting principles?

20 A. I think all of those cases in the Red  
21 Book and I think it's tremendous materials to  
22 have available.

23 Q. Right. So nothing else that we  
24 should know of?

25 A. Not that I recall. But, again, that